Bryan W. Shaw, Ph.D., Chairman Buddy Garcia, Commissioner Carlos Rubinstein, Commissioner Mark R. Vickery, P.G., Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 7, 2010

MR TERRY L HURLBURT SENIOR VICE PRESIDENT OPERATIONS ENTERPRISE PRODUCTS OPERATING LLC PO BOX 4324 HOUSTON TX 77210-4324

Re: Permit Amendment Application

Permit Numbers: 8707 and PSDTX655M1

Enterprise Mont Belvieu Complex Mont Belvieu, Chambers County

Regulated Entity Number: RN102323268 Customer Reference Number: CN603211277

Account Number: CI-0008-R

Dear Mr. Hurlburt:

AIR PLANNING SEC

This is in response to your letter received August 14, 2009, and your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the proposed amendment to Permit Numbers 8707 and PSDTX655M1. We understand you propose to include the existing cooling tower in the special conditions and maximum allowable emission rates table (MAERT) pursuant to an agency approved enforcement order.

As indicated in Title 30 Texas Administrative Code § 116.116(b) and § 116.160 [30 TAC § 116.116(b) and § 116.160], and based on our review, Permit Numbers 8707 and PSDTX655M1 are hereby amended. This information will be incorporated into the existing permit file. Enclosed are revised special conditions pages and a MAERT to replace those currently attached to your permit. We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met.

No planned maintenance, startup, and shutdown emissions have been reviewed or represented in this application and none are authorized by this permit.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

Mr. Terry L. Hurlburt Page 2 January 7, 2010

Re: Permit Numbers 8707 and PSDTX655M1

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

http://www.tceq.state.tx.us/compliance/compliance support/ga/env lab accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.state.tx.us.

You may file a **motion to overturn** with the Chief Clerk. A motion to overturn is a request for the commission to review the executive director's decision. Any motion must explain why the commission should review the executive director's decision. According to 30 TAC § 50.139, an action by the executive director is not affected by a motion to overturn filed under this section unless expressly ordered by the commission.

A motion to overturn must be received by the Chief Clerk within 23 days after the date of this letter. An original and 11 copies of a motion must be filed with the Chief Clerk in person, or by mail to the Chief Clerk's address on the attached mailing list. On the same day the motion is transmitted to the Chief Clerk, please provide copies to the applicant, the executive director's attorney, and the Public Interest Counsel at the addresses listed on the attached mailing list. If a motion to overturn is not acted on by the commission within 45 days after the date of this letter, then the motion shall be deemed overruled.

You may also request **judicial review** of the executive director's approval. According to Texas Health and Safety Code § 382.032, a person affected by the executive director's approval must file a petition appealing the executive director's approval in Travis County district court within 30 days after the <u>effective date of the approval</u>. Even if you request judicial review, you still must exhaust your administrative remedies, which includes filing a motion to overturn in accordance with the previous paragraphs.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Stephen E. Anderson, P.E., at (512) 239-1287 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Mr. Terry L. Hurlburt Page 3 January 7, 2010

Re: Permit Numbers 8707 and PSDTX655M1

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

Steve Hagle, P.E., Director

Air Permits Division

Office of Permitting and Registration

Texas Commission on Environmental Quality

SH/SEA/bb

Enclosures

cc: Air Section Manager, Region 12 - Houston

Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 150018

SPECIAL CONDITIONS

Permit Numbers 8707 and PSDTX655M1

FEDERAL APPLICABILITY

- 1. These facilities shall comply with applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations in Title 40 Code of Federal Regulations (40 CFR) Part 60, Subpart A on Standards of Performance for New Stationary Sources, General Provisions and the following:
 - A. Subpart GG, Stationary Gas Turbines. (PSD)
 - B. Subpart KKK, Equipment Leaks of Volatile Organic Compounds (VOC) from Onshore Natural Gas Processing Plants, for all of the following facilities: Butamer Units I and II, seminole fractionator, cogeneration turbines, carbon dioxide (CO₂) removal unit, and energy improvement project.
- 2. These facilities shall comply with applicable requirements of EPA regulations, 40 CFR Part 63, Subpart A, General Provisions, and Subpart Q, National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Industrial Process Cooling Towers.
- 3. If any condition of this permit is more stringent than the regulations incorporated by this permit, then for the purposes of complying with this permit, the permit shall govern and be the standard by which compliance shall be demonstrated.

EQUIPMENT AND OPERATING SPECIFICATIONS

4. The concentration of nitrogen oxides (NO_x) in the stack gases from each of the two water-injected 501 KC5 Allison turbines shall not exceed 54 parts per million volume dry (ppmvd) corrected to 15 percent oxygen (O₂) except during planned maintenance engine rinses. (PSD)

The concentration of NO_x in the stack gases from each of the two water-injected 501 KB5 Allison Turbines shall not exceed 42 ppmvd corrected to 15 percent O_2 . Monitoring of emissions must satisfy the requirements of 40 CFR Part 60, Subpart GG, 30 TAC Chapter 117 and the requirements of this permit. (PSD)

Records of planned maintenance engine rinsing operations for the two 501 KC5 Allison turbines which include date of activity, start and ending time, amount of water used, firing rate load and total estimated emissions shall be made and maintained by the holder of this permit for a period of two years and shall be made readily available on request to representatives of the TCEQ and the EPA.

5. Piping, Valves, Connectors, Pumps and Compressors in VOC Service - 28MID

Except as may be provided for in the special conditions of this permit, the following requirements apply to the above-referenced equipment:

- A. These conditions shall not apply (1) where the VOC has an aggregate partial pressure or vapor pressure of less than 0.044 pound per square inch, absolute at 68°F, or (2) where the operating pressure is at least 5 kilopascals (0.725 pound per square inch) below ambient pressure. Equipment excluded from this condition shall be identified in a list to be made available upon request.
- B. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute, American Petroleum Institute, American Society of Mechanical Engineers, or equivalent codes.
- C. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical.
- D. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation. Non-accessible valves, as defined by Title 30 Texas Administrative Code (30 TAC) Chapter 115, shall be identified in a list to be made available upon request.
- E. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. No later than the next scheduled quarterly monitoring after initial installation or replacement, all new or reworked connections shall be gas-tested or hydraulically-tested at no less than normal operating pressure and adjustments made as necessary to obtain leak-free performance. Connectors shall be inspected by visual, audible, and/or olfactory means at least weekly by operating personnel walk-through.
 - Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. Except during sampling, the second valve shall be closed.
- F. Accessible valves shall be monitored by leak-checking for fugitive emissions at least quarterly using an approved gas analyzer with a directed maintenance program. Sealless/leakless valves (including, but not limited to, welded bonnet bellows and diaphragm valves) and relief valves equipped with a rupture disc upstream or venting to a control device are not required to be monitored. For valves equipped with

rupture discs, a pressure-sensing device shall be installed between the relief valve and rupture disc to monitor disc integrity. All leaking discs shall be replaced at the earliest opportunity but no later than the next process shutdown.

An approved gas analyzer shall conform to requirements listed in 40 CFR § 60.485(a)-(b).

A directed maintenance program shall consist of the repair and maintenance of components assisted simultaneously by the use of an approved gas analyzer such that a minimum concentration of leaking VOC is obtained for each component being maintained. Replaced components shall be re-monitored within 15 days of being placed back into VOC service.

G. All new and replacement pumps and compressors shall be equipped with a shaft sealing system that prevents or detects emissions of VOC from the seal. These seal systems need not be monitored and may include (but are not limited to) dual pump seals with barrier fluid at higher pressure than process pressure, seals degassing to vent control systems kept in good working order, or seals equipped with an automatic seal failure detection and alarm system. Submerged pumps or sealless pumps (including, but not limited to, diaphragm, canned, or magnetic-driven pumps) may be used to satisfy the requirements of this condition and need not be monitored.

All other pump and compressor seals emitting VOC shall be monitored with an approved gas analyzer at least quarterly.

- H. Damaged or leaking valves, connectors, compressor seals, and pump seals found to be emitting VOC in excess of 500 parts per million by volume or found by visual inspection to be leaking (e.g., dripping process fluids) shall be tagged and replaced or repaired. Every reasonable effort shall be made to repair a leaking component, as specified in this paragraph, within 15 days after the leak is found. If the repair of a component would require a unit shutdown, the repair may be delayed until the next scheduled shutdown. All leaking components which cannot be repaired until a scheduled shutdown shall be identified for such repair by tagging. At the discretion of the Texas Commission on Environmental Quality (TCEQ) Executive Director or his designated representative, early unit shutdown or other appropriate action may be required based on the number and severity of tagged leaks awaiting shutdown.
- In lieu of the monitoring frequency specified in paragraph F, valves in gas and light liquid service may be monitored on a semiannual basis if the percent of valves leaking for two consecutive quarterly monitoring periods is less than 0.5 percent. Valves in gas and light liquid service may be monitored on an annual basis if the

percent of valves leaking for two consecutive semiannual monitoring periods is less than 0.5 percent.

If the percent of valves leaking for any semiannual or annual monitoring period is 0.5 percent or greater, the facility shall revert to quarterly monitoring until the facility again qualifies for the alternative monitoring schedules previously outlined in this paragraph.

J. The percent of valves leaking used in paragraph I shall be determined using the following formula:

$$(Vl + Vs) \times 100/Vt = Vp$$

Where:

- V1 = the number of valves found leaking by the end of the monitoring period, either by Method 21 or sight, sound, and smell.
- Vs = the number of valves for which repair has been delayed and are listed on the facility shutdown log.
- Vt = the total number of valves in the facility subject to the monitoring requirements, as of the last day of the monitoring period, not including nonaccessible and unsafe-to-monitor valves.
- Vp = the percentage of leaking valves for the monitoring period.
- K. The results of the required fugitive instrument monitoring and maintenance program shall be made available to the TCEQ Executive Director or his designated representative upon request. Records shall indicate appropriate dates, test methods, instrument readings, repair results, justification for delay of repairs, and corrective actions taken for all components. Records of physical inspections are not required unless a leak is detected.
- L. Compliance with the requirements of this condition does not assure compliance with requirements of 30 TAC Chapter 115, an applicable New Source Performance Standards (NSPS) or an applicable NESHAP and does not constitute approval of alternative standards for these regulations.

- 6. In addition to the weekly physical inspection required by paragraph E of Special Condition No. 5, all connectors in gas/vapor and light liquid service shall be monitored quarterly with an approved gas analyzer in accordance with paragraphs F through J of Special Condition No. 5. Alternative monitoring frequency schedules of 40 CFR Part 63, Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks, may be used in lieu of the monitoring frequency required by this permit condition. Compliance with this condition does not assure compliance with requirements of applicable state or federal regulation and does not constitute approval of alternative standards for these regulations.
- 7. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the maximum allowable emission rates table (MAERT). Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than one weight percent are not consistent with good practice for minimizing emissions.
- 8. Acid gas or other waste gases generated from normal operation from these facilities must be burned in the flare specified in the permit application. Planned maintenance, startup, and shutdown activities and emissions are not authorized by this special condition. (1/10)
- 9. Fuels fired in the gas turbines are limited to:
 - A. Pipeline-quality sweet natural gas containing no more than 5 grains per 100 dry standard cubic feet total sulfur. Fuel sampling and analysis for sulfur content is required at least once annually (calendar year) and whenever the fuel supply source changes. If a valid fuel contract or tariff sheet demonstrates compliance with the sulfur limitation of this condition, no sampling of the fuel's total sulfur content is required. (12/04)
 - B. Overhead products from the deethanizer containing a maximum of 20 parts per million by weight of hydrogen sulfide.

Use of any other fuel will require modification to this permit. The results of all fuel sampling conducted or vendor contracts pursuant to this special condition and all hourly periods during which any fuel other than natural gas or overhead product from the deethanizer is fired into the turbines shall be made and maintained by the holder of this permit for a period of two years and shall be made available on request to representatives of the TCEO and the EPA.

- 10. The off-gas from the Merox unit may be burned in the heat recovery unit under the following conditions: (PSD)
 - A. The duct burners associated with Deisobutanizer (DIB) 1300 and DIB 900 are unable or unauthorized to burn the waste gas.
 - B. The total time Merox off-gas is burned in the heat recovery unit does not exceed 876 hours per rolling 12-month period.
 - C. The sulfur content is monitored as required in Special Condition No. 15.

Daily records of heat recovery unit operations which includes the total heat input, total fuel usage rate, fuel sulfur concentration, Merox off-gas burned, total sulfur content of off-gas, and total daily emissions shall be made and maintained by the holder of this permit for a period of two years and shall be made available on request to representatives of the TCEQ and the EPA.

11. The VOC associated with Cooling Tower Water (EPN F8A) shall be monitored once a month. The monthly sampling shall meet the air stripping system meeting the requirements of the TCEQ Sampling Procedures Manual, Appendix P (dated January 2003 or a later edition) or another air stripping method approved by the TCEQ Executive Director. (1/10)

Cooling water VOC concentrations above 0.08 ppmw indicate faulty equipment. Equipment shall be maintained so as to minimize VOC emissions into the cooling water. Faulty equipment shall be repaired at the earliest opportunity but no later than the next scheduled shutdown of the process unit in which the leak occurs. (1/10)

The VOC emissions from the cooling tower are not authorized if the VOC concentration of water returning to the cooling tower exceeds 0.50 ppmw. The VOC concentrations above 0.50 ppmw are not subject to extensions for delay of repair under this permit condition. The results of the monitoring and maintenance efforts shall be recorded. (1/10)

Cooling water shall be sampled once a week for total dissolved solids (TDS) and once a day for conductivity from the cooling tower water used in the cooling tower designated as EPN F8A. The TDS is a limited to a maximum of 3,500 ppmw in the recirculating cooling water and in the make up cooling water supplied to this cooling water circulation system. Dissolved solids in the cooling water drift are considered to be emitted as PM₁₀. The data shall result from collection of water samples from the cooling tower feed water and represent the water being cooled in the tower. Water samples should be capped upon collection and transferred to a laboratory area for analysis. The analysis method for TDS

shall be EPA Method 160.1, ASTM D5907, and SM 2540 C [SM - 19th edition of Standard Methods for Examination of Water]. The analysis method for conductivity shall be ASTM D1125-95A and SM2510 B. Use of an alternative method shall be approved by the TCEQ Regional Director prior to its implementation. (1/10)

The Cooling Tower designated as EPN F8A shall be equipped with mist eliminators to meet a drift value of 0.002 percent for particulate emissions. (1/10)

INITIAL DEMONSTRATION OF COMPLIANCE

- 12. The holder of this permit shall perform stack sampling and other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the two 501 KC5 Allison Turbines. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with EPA Reference Method 8 for Sulfur Dioxide (SO₂), Reference Method 10 for the concentration of carbon monoxide (CO), and Reference Method 20 for the concentrations of NO_x and O₂. Fuel sampling using the methods and procedures of 40 CFR § 60.335(b)(2) may be conducted in lieu of stack sampling for SO₂. Compliance with the MAERT and the fuel sulfur limits of Special Condition No. 9 shall be based upon 100 percent conversion of the sulfur in the fuel to SO₂. The holder of this permit is responsible for providing sampling and testing facilities and conducting sampling and testing operations at his expense. (PSD)
 - A. The TCEQ Houston Regional Office shall be contacted as soon as testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting.

The notice shall include:

- (1) Date for pretest meeting.
- (2) Date sampling will occur.
- (3) Name of firm conducting sampling.
- (4) Type of sampling equipment to be used.
- (5) Method or procedure to be used in sampling.
- (6) Procedure used to determine turbine loads during and after the sampling period.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in permit conditions or the TCEQ or the EPA sampling procedures shall be made available to the TCEQ at, or prior to, the pretest meeting. The TCEQ Regional Director or the Director of the TCEQ Austin Compliance Support Division shall approve or disapprove of any deviation from specified sampling procedures.

Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Permitting and Registration, Air Permits Division. Test waivers and alternate/equivalent procedure proposals for the NSPS testing, which must have the EPA approval, shall be submitted to the TCEQ Compliance Support Division. Any deviation from the sampling procedures, the use of any alternative or equivalent test procedures, or any test waivers shall be approved by the TCEQ and, if necessary, by the EPA prior to the test date required in Special Condition No. 13E for conducting the tests.

- B. Air contaminants emitted from the water-injected turbines to be tested for at full load include (but are not limited to) NO_x, CO, O₂, and SO₂ while firing natural gas only.
- C. For each type of turbine fuel fired, CO and NO_x from the water-injected turbines shall be sampled concurrently at 100 percent operating load only.
- D. The water-injection rates necessary to comply with the NO_x concentration limits stated in Special Condition No. 4 shall be established during the stack sampling required in this condition. Plots of water-injection rate versus turbine fuel input rate shall be constructed from the corrected NO_x concentrations. The adjusted NO_x emission concentrations as measured by stack tests shall be used to determine initial compliance with Special Condition No. 4. The plots shall be used to determine continuous compliance with Special Condition No. 4.
- E. Sampling shall occur within 60 days after achieving the maximum production rate at which the turbines will be operated, but no later than 180 days after initial startup of water injection.
- F. For the turbines sampled pursuant to this condition, the holder of this permit shall record during the stack sampling the value of each operating parameter which is significant to maintaining emission compliance as identified during the pretest meeting required in paragraph a of this special condition.

- G. During the testing, the water-to-fuel ratio rate necessary to comply with the NO_x concentration limit of 54 ppmvd at 15 percent O₂ shall be established over the normal operating load range. Testing of the two 501 KC5 Allison Turbines to determine NO_x concentrations shall be conducted at the exhaust of each gas turbine using either EPA reference Method 7, EPA Reference Method 7E or EPA Reference Method 20. Notification shall be provided to the TCEQ Regional Office at least 30 days prior to testing. The sampling report shall be submitted to the TCEQ Compliance Support Division in Austin and to the TCEQ Regional Office within 45 days of sampling.
- H. Within 60 days after the completion of the testing and sampling required herein, one copy of the sampling report shall be distributed to the TCEQ Houston Regional Office.

CONTINUING DEMONSTRATION OF COMPLIANCE

- 13. The holder of this permit shall install, calibrate, maintain and operate a continuous monitoring system to measure and record the fuel and water consumption in the two 501 KC5 Allison Turbines and the two 501 KB5 Allison Turbines. The system shall be accurate to ±5 percent. The water-to-fuel ratio determined during initial compliance testing shall be used to demonstrate continual compliance with the NO_x concentration limits specified in Special Condition No. 4. (PSD)
- 14. After the demonstration of initial compliance as described in Special Condition No. 12, the methods required in Special Condition No. 12 shall constitute the methods for demonstrating continuous compliance with the standards. The continuous monitoring data will be used to evaluate compliance with the emission limits in the MAERT and Special Condition Nos. 4 and 9. (PSD)
- 15. The holder of this permit shall propose and implement a method acceptable to the TCEQ Houston Regional Office to determine the hourly emission rates from the heat recovery unit using daily fuel usage rates and total heat input values. The total daily heat input in MMBtu for the gas turbines and the gas-fired heater shall be defined as the summation of the daily flow rate for each type of fuel used multiplied by the fuels higher heating value. Daily records of turbine operation which includes total heat input, total fuel usage rate and total fuel sulfur concentration shall be made and maintained by the holder of this permit for a period of two years and shall be made available on request to representatives of the TCEQ and the EPA. (PSD)

- 16. Total daily SO₂ emissions from the heat recovery unit shall be calculated using the total daily fuel usage rates, fuel sulfur concentrations, Merox off-gas burn rates, and total sulfur content of Merox off-gas. These emission rates shall be based on 100 percent conversion of the sulfur in the fuel into SO₂.
- 17. Total calculated annual emissions from the heat recovery unit shall be defined as the summation of the daily emissions based on a rolling 12-month period.

Dated January 7, 2010

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Numbers 8707 and PSDTX655M1

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates*	
			lb/hr	TPY**
10/11	Two 501 KB5 Allison Turbines	CO (7)	6.41	24.32
10/11	with 1/2 Duct Burner Contribution	$NO_{x}(7)$	22.00	83.22
	Cogeneration (5)	PM_{10}	0.82	3.34
	oogeneranon (c)	SO_2	1.44	0.82
		VOC	0.28	1.21
10/11	Two 501 KC5 Allison Turbines	CO (7)	7.63	33.01
	with 1/2 Duct Burner Contribution	$NO_{x}(7)$	35.94	101.51
	Fractionator (5)	PM_{10}	0.80	3.40
		SO_2	1.55	0.86
		VOC	0.28	1.20
F6	Seminole Fractionator Fugitives (4)	VOC	0.91	3.98
F7	Carbon Dioxide Removal Unit Fugitives (4)	VOC	0.29	1.27
F8	Energy Improvement Project Fugitives (4)	VOC	0.82	3.60
F8A	Seminole Cooling Tower (6)	PM_{10}	1.16	5.08
	5	VOC	8.26	5.79
FL-1	Main Flare Contribution	CO	4.00	17.40
		NO_x	2.00	8.70
		SO_2	0.10	0.10
		VOC	5.30	23.20

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (1) Emission point identification either specific equipment designation or emission point number (EPN) from plot plan.
- (2) Specific point source name. For fugitive sources use area name or fugitive source name.
- (3) CO carbon monoxide
 - NO_x total oxides of nitrogen
 - PM₁₀ particulate matter (PM) equal to or less than 10 microns in diameter. Where PM is not listed, it shall be assumed that no particulate matter greater than 10 microns is emitted.
 - SO₂ sulfur dioxide
 - VOC volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- (4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.
- (5) Four Turbines (two 501 KB5 and two 501KC5 turbines) are ducted into one duct burner. The exhaust from the one duct burner is directed to two co-located Stacks (EPNs 10 and 11).
- (6) Emission rate is an estimate only. Compliance is enforceable through conformity with the applicable special condition(s) and permit application representations.
- (7) Prevention of Significant Deterioration regulated pollutant.
 - * Emission rates are based on a maximum operating schedule of:

Hrs/day 24 Days/week 7 Weeks/year 52

** Compliance with annual emission limits is based on a rolling 12-month period.

Dated January 7, 2010